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5 Attorney for the Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF NEVADA**

9 **SHENDONNA SOPHIA McLAINÉ,**

10 **Plaintiff,**

11 **v.**

12 **CLARK COUNTY, NEVADA; et. al.,**

13 **Defendants.**

14 } Case No. 2:14-cv-0288-JAD-GWF

15 **STIPULATION ABOUT DISCOVERY PROCEDURE**

16 Pursuant to Federal Rule of Civil Procedure 29 the parties respectfully request that the
17 Court approve this stipulation governing discovery procedure. At the outset it should be
18 emphasized that this is not a stipulation to extend discovery, which closes on October 31, 2016.
19 Rather, this is simply a stipulation to permit the parties to complete various depositions that were
20 timely noticed prior to the close of discovery but due to scheduling conflicts must now be
21 completed after the close of discovery. In submitting this stipulation for approval to the Court,
22 the parties intend to complete the depositions of the following individuals within approximately
23 the next two weeks:

- 24 1. “PMK” of Las Vegas Metropolitan Police Department;
25 2. “PMK” of the Clark County District Attorney’s Office;
26 3. “PMK” of Clark County, Nevada;
 4. Christopher Lalli, Esq.
 5. Frank Coumou, Esq.

- 1 6. Peter Thunell, Esq.
- 2 7. Michelle Anthony, Esq.
- 3 8. Aaron Nance, Esq.
- 4 9. Phillip J. Kohn, Esq.
- 5 10. Benjamin Saxe, Esq.
- 6 11. Tom Roberts
- 7 12. Officer Scott Friedman
- 8 13. Officer Richard Zaccara

Additionally, Plaintiff's counsel intends to depose Alexandra Chrysanthis, Esq., Craig Hendricks, Esq., Michael Radovcic, Esq. and Brett Keller, Esq.. All four individuals were formerly employed by the Clark County District Attorney's Office.

Although this may appear to be a large number of depositions, the majority of them are not anticipated to last more than an hour and several can be taken on the same day. Further, the parties anticipate the majority, if not all, of the above-identified individuals will be deposed within the next two weeks. This stipulation is being filed merely for the purpose of accommodating the busy schedules of the various witnesses, many of whom are attorneys, who would otherwise have to appear on the currently scheduled dates prior to the close of discovery. Plaintiff's counsel has represented that no other depositions will be noticed apart from the ones involving the individuals identified in this stipulation. Neither side will engage in any written discovery. Thus, as indicated above, this is not an extension of discovery *per se* but instead merely a request seeking approval to complete certain depositions outside the close of discovery.

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The parties respectfully request that the Court approve this stipulation which is not filed for the purpose of delay but rather merely to accommodate the busy schedules of various witnesses and for the purpose of completing depositions that were otherwise timely noticed.

Respectfully submitted,

/s/ Lucinda L. Common

/s/ Paul S. Padda

Lucinda L. Coumou, Esq.
Chief Deputy District Attorney, Civil Division
Clark County District Attorney's Office

Paul S. Padda, Esq.
Paul Padda Law

Attorney for Plaintiff

Dated: October 27, 2016

Dated: October 27, 2016

/s/ Robert W. Freeman, Jr.

Robert W. Freeman, Jr., Esq.
Lewis Brisbois Bisgaard & Smith

Attorney for Las Vegas Metropolitan Police Department
and Officers R. Zaccara and S. Friedman

Dated: October 27, 2016

IT IS SO ORDERED:

The Court hereby approves the parties' stipulation filed pursuant to Federal Rule of Civil Procedure 29. The parties represent that they are not seeking an extension of the discovery period but instead seek merely to complete depositions that were timely noticed prior to the close of discovery. Plaintiff's counsel shall file a status report on or before November 18, 2016 indicating which depositions identified in the stipulation have been completed. No discovery beyond completion of the depositions of the individual witnesses identified in the stipulation shall be permitted.

UNITED STATES MAGISTRATE JUDGE

Dated: October 28th , 2016